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May 27, 2025

VIA ECF

Hon. Valerie E. Caproni
Thurgood Marshall United States Courthouse
Southern District of New York
40 Foley Square, Courtroom 443
New York, New York 10007

MEMO ENDORSED

**Re: Robert C. Bass v. Citi Global Markets Inc.
Case No. 24-CV-04586-VEC**

Dear Judge Caproni:

We represent Respondent Citigroup Global Markets Inc. (“Respondent”) in the above-referenced proceeding. We respectfully submit this letter in accordance with Rule 21.7 of the Electronic Case Filing Rules of Southern District of New York to request that Exhibit 1 to the May 23, 2025 Declaration of Adam Kauff (Dkt. 49-1) be formally sealed by the Court. Respondent mistakenly filed the document on May 23, 2025 without redacting confidential information—in particular, Petitioner’s answer to a security question for his account with Respondent.

Respondent has discussed the matter with Petitioner, who has requested that the information be sealed.

Accordingly, Respondent respectfully requests that the original filing (Dkt. 49-1) be formally sealed, and Respondent be permitted to file a properly redacted document for public viewing.

Thank you for your consideration.

Respectfully,

/s/ Adam Kauff

Adam Kauff

Kauff Laton Miller LLP

Application GRANTED. The proposed redactions effectively balance the asserted privacy interests against the right of public access to judicial documents. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). Respondent is granted leave to file a redacted version of the exhibit discussed above, and the exhibit at Dkt. 49-1 will remain sealed.

SO ORDERED.

 5/28/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE